

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

|                              |   |                            |
|------------------------------|---|----------------------------|
| PARADYME ASSET               | § |                            |
| MANAGEMENT,                  | § |                            |
| LLC,                         | § | Case No. SA-24-CV-00737-XR |
| <i>Plaintiff</i>             | § |                            |
|                              | § |                            |
| v.                           | § |                            |
|                              | § |                            |
| FIGURD, LLC, <i>et al.</i> , | § |                            |
| <i>Defendant</i>             | § |                            |

**PLAINTIFF'S EXPERT WITNESS DISCLOSURE**

Plaintiff Paradyme Asset Management, LLC (“Paradyme”), pursuant Fed. R. Civ. P. 26(a)(2)(A) and the Court’s scheduling orders, identifies the following retained expert witness who may be used at trial to present evidence in this matter:

Steven Lawrence Biegel, AIA, NCARB, LEED AP Architect  
Broadview Development Corporation  
4614 Columbus Drive  
Rossharon, Texas 77583  
c/o Carlton Fields, P.A.

Mr. Biegel is expected to testify consistent with his the report served on Defendants in accordance with the Court’s Second Amended Scheduling Order [D.E. 35]. Paradyme reserves the right to supplement this expert disclosure and any reports prepared by said witness, including but not limited to supplementing with additional expert witnesses that may be identified upon further discovery or investigation. Paradyme reserves the right to call at trial any and all experts identified by Defendants, notwithstanding any subsequent decision to withdraw the designation of such experts.

Dated: March 3, 2025

/s/ Aaron S. Weiss

Aaron S. Weiss  
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James S. Czodli (Florida Bar #123523)  
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